

PAUL HASTINGS

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June 23, 2020

MEMO ENDORSED

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Petróleos de Venezuela, et al. v. MUFG Union Bank, N.A., et. al.*, Case No. 1:19-cv-10023-KPF
(S.D.N.Y.)

Dear Judge Failla:

The Declaration of David C. Hinman in Support of Plaintiffs' Motion for Summary Judgment, which was filed under seal on June 10, 2020, was meant to include as Exhibit A the Expert Report of David C. Hinman, CFA, dated March 16, 2020. It has come to our attention that the Hinman report was inadvertently omitted from the filing on June 10, 2020, and only the exhibit cover page was filed.

Plaintiffs respectfully request permission to file under seal a corrected Hinman declaration attaching the unredacted Hinman report as intended.

Defendants have consented to this request.

Respectfully,



James R. Bliss
of PAUL HASTINGS LLP

cc: Counsel of record

Application GRANTED.

Dated: June 24, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE